

EXHIBIT 11

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----x
5 KATHRYN TOWNSEND GRIFFIN,
6 HELEN MCDONALD, and THE ESTATE
7 OF CHERRIGALE TOWNSEND,

8 -against-

9 Civil Action No.:
10 1:17-CV-05221-RJS/GRIFFIN

11 EDWARD CHRISTOPHER SHEERAN,
12 p/k/a ED SHEERAN, ATLANTIC
13 RECORDING CORPORATION, d/b/a
14 ATLANTIC RECORDS, SONY/ATV
15 MUSIC PUBLISHING LLC and
16 WARNER MUSIC GROUP
17 CORPORATION, d/b/a ASYLUM
18 RECORDS,

19 Defendants.

20 -----x
21 April 24, 2018
22 10:30 a.m.

23 Deposition of KATHRYN TOWNSEND GRIFFIN GRINAN,
24 taken by Defendants, pursuant to Notice, held at the
25 law offices of Pryor Cashman, LLP, 7 Times Square,
New York, New York, before Judith Castore, a
Certified Livenote Reporter and Notary Public of the
State of New York.

<p style="text-align: right;">Page 34</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 time I would serve up to 35 years</p> <p>3 day-to-day in prison. And, well, as we</p> <p>4 see today, I made it. And I am so</p> <p>5 grateful.</p> <p>6 Q Why you were facing up to 35</p> <p>7 years in prison?</p> <p>8 A In the state of Texas you got</p> <p>9 three strikes you're out, meaning three</p> <p>10 felonies. So on my -- the first three</p> <p>11 are misdemeanors, the first three</p> <p>12 arrests. After that, your third felony</p> <p>13 warrants 25 to life. And prostitution</p> <p>14 at that time happened to be, you know,</p> <p>15 one of those charges where you could</p> <p>16 serve 25 to life for actually</p> <p>17 destroying yourself.</p> <p>18 And so they started The</p> <p>19 Success Through Addiction Recovery</p> <p>20 Program, and because I had -- I didn't</p> <p>21 have any violent crimes. My crimes was</p> <p>22 possession of a controlled substance</p> <p>23 less than a gram, which was a empty</p> <p>24 crack pipe, and getting in the car with</p> <p>25 an undercover cop prostituting or</p>	<p style="text-align: right;">Page 36</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 the prostitution. But I was saved by</p> <p>3 the empty crack pipe in my bra, that</p> <p>4 warranted 10. So 25 and 10, I could do</p> <p>5 35. I could do 35 had I messed up on</p> <p>6 this deferred adjudicated probation.</p> <p>7 Q Okay.</p> <p>8 So it would be safe -- is it</p> <p>9 accurate to say that the prior arrests</p> <p>10 that brought you to that point where</p> <p>11 you were facing up to 35 years in</p> <p>12 prison were either prostitute- or</p> <p>13 drug-related charges?</p> <p>14 A Yes.</p> <p>15 Q Other than the nightclub --</p> <p>16 so you've mentioned the National Tour</p> <p>17 of Wiz, and you've mentioned the</p> <p>18 nightclub, and you've mentioned the</p> <p>19 brief touring with Rick James.</p> <p>20 After that, did you have any</p> <p>21 other jobs where you were working in</p> <p>22 the music business?</p> <p>23 A I was a prostitute.</p> <p>24 Q So how long were you a</p> <p>25 prostitute for?</p>
<p style="text-align: right;">Page 35</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 walking on the roadway where sidewalks</p> <p>3 were provided when there really were no</p> <p>4 sidewalks. And all of these things</p> <p>5 came along with my drug addiction.</p> <p>6 When I was introduced to</p> <p>7 cocaine, everything that I felt I was</p> <p>8 missing, it felt at the time -- it gave</p> <p>9 me a purpose. And like I say, I'm</p> <p>10 grateful for the fact that God allowed</p> <p>11 me to live through it because it has</p> <p>12 everything to do with the work that I</p> <p>13 do today. And I am able to help</p> <p>14 thousands of people, thousands. And</p> <p>15 I'm so grateful.</p> <p>16 Q I'm sure they're grateful to</p> <p>17 you, as well.</p> <p>18 So just so I understand you</p> <p>19 correctly, would it be accurate to say</p> <p>20 that the three or four prior arrests</p> <p>21 that led you to be facing up to 35</p> <p>22 or -- was it 35 or --</p> <p>23 A 35 --</p> <p>24 Q 35 years in prison --</p> <p>25 A Well, it was 25 to life for</p>	<p style="text-align: right;">Page 37</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A Until '86 when they took me</p> <p>3 into the drug court.</p> <p>4 Q And what happened next?</p> <p>5 A I changed my life. I</p> <p>6 completed my final treatment. I</p> <p>7 actually found out things that had</p> <p>8 haunted me. I was -- the year that I</p> <p>9 got sober -- my first rehab was in '86,</p> <p>10 and that's the year I found out I had</p> <p>11 been adopted and that Ed Townsend was</p> <p>12 my father. And so a lot of holes were</p> <p>13 closed because I -- I had been lied to</p> <p>14 my entire life.</p> <p>15 Q And we'll certainly get to</p> <p>16 that. I'm just trying to figure out</p> <p>17 sort of the chronology so we can work</p> <p>18 off that.</p> <p>19 So you went into your first</p> <p>20 treatment program in 1986, correct?</p> <p>21 A Yes.</p> <p>22 Q And did you have any other --</p> <p>23 how long were you in treatment for?</p> <p>24 A The first time?</p> <p>25 Q Well, I'm trying to get a</p>

10 (Pages 34 - 37)

<p style="text-align: right;">Page 38</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 sense of -- you said you went into</p> <p>3 treatment in 1986.</p> <p>4 A I did stints of 90 days. I</p> <p>5 did jail programs. I did prison</p> <p>6 programs. I did inpatient, outpatient</p> <p>7 programs. I was always doing my very</p> <p>8 best to -- whether I was -- my family</p> <p>9 made me go or I would go just so I</p> <p>10 could fatten up, check to make sure I</p> <p>11 was healthy, didn't catch anything I</p> <p>12 couldn't get rid of so I could go back</p> <p>13 to smoke some more dope. I was in it</p> <p>14 full force.</p> <p>15 Q And how long a period of time</p> <p>16 would you say you were in it?</p> <p>17 A From the first time I ever</p> <p>18 touched cocaine until 2003, when I got</p> <p>19 sober and my father died. After my</p> <p>20 father died I got sober.</p> <p>21 Q Between 1986 and 2003, then</p> <p>22 would it be accurate to say that the</p> <p>23 only work that you had been involved</p> <p>24 with was prostitution?</p> <p>25 A I lived to get high and I got</p>	<p style="text-align: right;">Page 40</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 the guilt and the shame. For years I</p> <p>3 did that.</p> <p>4 And at the time I felt</p> <p>5 hopeless and I messed up so bad and I</p> <p>6 had children and I felt unworthy to be</p> <p>7 a parent. I felt like I had just</p> <p>8 wasted my whole life. I did. I was</p> <p>9 embarrassed. And I hoped that at that</p> <p>10 point that I would just die so that I</p> <p>11 could just be removed from the</p> <p>12 burdening of this heavy dark addiction</p> <p>13 that had plagued me when all I ever</p> <p>14 wanted to do was do the right thing.</p> <p>15 How did it go from that to that? I</p> <p>16 understand it today, but I'm just --</p> <p>17 I'm just telling you how I felt during</p> <p>18 that dark, black, bottomless pit era in</p> <p>19 my life.</p> <p>20 Q And other than the two</p> <p>21 children that you've previously</p> <p>22 mentioned, did you have any other</p> <p>23 children during this time?</p> <p>24 A I have another daughter.</p> <p>25 Q And what's the age difference</p>
<p style="text-align: right;">Page 39</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 high to live. And my addiction</p> <p>3 warranted me to feed me, I'm hungry.</p> <p>4 And it took me from living a</p> <p>5 acceptable -- socially acceptable life</p> <p>6 into behind trash dumpsters, hot sheet</p> <p>7 motels, Skid Row. I lived in Tent</p> <p>8 City. I lived -- I didn't live in Port</p> <p>9 Authority, but when I'd come to</p> <p>10 New York you could always go to Port</p> <p>11 Authority and go in the bathroom and</p> <p>12 get high. And they used -- well,</p> <p>13 42nd Street used to have all the</p> <p>14 little restaurants and I'd go in the</p> <p>15 Burger -- you'd go downstairs, you'd go</p> <p>16 in the -- anywhere I could get high</p> <p>17 because I had -- my addiction, I didn't</p> <p>18 know anything but just trying to cover</p> <p>19 up, cover up, cover up, fill those</p> <p>20 empty holes and how did my life go from</p> <p>21 here to here. So I was stuck for years</p> <p>22 in the poor old me syndrome, poor old</p> <p>23 me. Oh, my family is disappointed. Oh</p> <p>24 I was in college. Oh, how did I mess</p> <p>25 my life up? So I got high to cover up</p>	<p style="text-align: right;">Page 41</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 between your second and your third?</p> <p>3 A Four years. I got pregnant</p> <p>4 from my drug dealer. And she's never</p> <p>5 met her father to this date. I did</p> <p>6 find him and they've talked, yeah.</p> <p>7 Q And do you have a</p> <p>8 relationship with your three children</p> <p>9 currently?</p> <p>10 A Closer, tighter than</p> <p>11 anything. I couldn't have never</p> <p>12 imagined a relationship with them and</p> <p>13 them even wanting to have a</p> <p>14 relationship with me. They came to</p> <p>15 visit me in prison once. They would</p> <p>16 come to the rehabs and I swore when I</p> <p>17 got in drug court my children would</p> <p>18 never have to see me behind bars and in</p> <p>19 a rehab ever again. And because I</p> <p>20 stuck to it, it took up to four years,</p> <p>21 but they watched. They watched. And</p> <p>22 they've told me that they always knew</p> <p>23 that their mother was in there.</p> <p>24 Q And who was taking care of</p> <p>25 your children during the time that</p>

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<p style="text-align: right;">Page 42</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 you -- during the time of your</p> <p>3 addiction and prostitution?</p> <p>4 A Shirley and Ernest Griffin,</p> <p>5 my adoptive parents. And when they</p> <p>6 died they came to live in Houston with</p> <p>7 my oldest daughter's grandmother,</p> <p>8 because the grandmother did not want</p> <p>9 the children separated.</p> <p>10 Q Did Shirley and Ernest</p> <p>11 Griffin ever adopt your children?</p> <p>12 A Yes. So my children actually</p> <p>13 legally became my sisters. We are the</p> <p>14 Griffin sisters.</p> <p>15 Q You never know where life is</p> <p>16 going to take you, right?</p> <p>17 A Now, you notice this is going</p> <p>18 to be colorful. If you start talking</p> <p>19 about my life, it's very colorful.</p> <p>20 This poor lady is going to jump out the</p> <p>21 seat, poor little old lady. I feel</p> <p>22 sorry. You're going to be entertained</p> <p>23 if you want to know about my life.</p> <p>24 Q I'm sure she's heard a lot</p> <p>25 sitting in that seat.</p>	<p style="text-align: right;">Page 44</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A You just need to know who I</p> <p>3 am.</p> <p>4 Q Well, it's more than -- it's</p> <p>5 slightly different than that. It's --</p> <p>6 I want to know what you recall. And if</p> <p>7 you don't recall something, you don't</p> <p>8 recall it. I don't want you to guess.</p> <p>9 I don't want you to speculate. This</p> <p>10 isn't a memory test. So -- and a lot</p> <p>11 of these events.</p> <p>12 A Thank you, because I don't</p> <p>13 remember.</p> <p>14 Q I'm sure we can all -- this</p> <p>15 is -- yeah.</p> <p>16 So if you don't remember</p> <p>17 something --</p> <p>18 A I don't.</p> <p>19 Q -- then you don't remember</p> <p>20 it. And that just is what it is. I</p> <p>21 don't know what you recall and what you</p> <p>22 don't recall, so I'm going to ask</p> <p>23 questions and we'll see what you know</p> <p>24 and what you don't know and we'll move</p> <p>25 on from there.</p>
<p style="text-align: right;">Page 43</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Do you recall whether Shirley</p> <p>3 and Ernest Griffin adopted your -- I'm</p> <p>4 sorry, do you have three daughters?</p> <p>5 A Yes.</p> <p>6 Q Do you know whether Shirley</p> <p>7 and Ernest Griffin adopted your three</p> <p>8 daughters at the same time?</p> <p>9 A Yes.</p> <p>10 Q And do you recall what year</p> <p>11 that was?</p> <p>12 A No.</p> <p>13 Q Do you recall whether it was</p> <p>14 in the 1980s?</p> <p>15 A No, I don't know. Let me</p> <p>16 just say this, I was high. I don't</p> <p>17 know -- that whole era, dates and</p> <p>18 times, it didn't matter. I didn't care</p> <p>19 what day it was, what time it was, I</p> <p>20 didn't -- so it's just not there. It's</p> <p>21 just not there.</p> <p>22 Q Understood.</p> <p>23 And part of today's -- what a</p> <p>24 deposition is is I only want to know</p> <p>25 and I can only ask what you --</p>	<p style="text-align: right;">Page 45</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A Okay.</p> <p>3 Q Do you recall having a</p> <p>4 discussion with Shirley or Ernest</p> <p>5 Griffin about the fact that they wanted</p> <p>6 to adopt your children?</p> <p>7 A No.</p> <p>8 Q Were you involved at all in</p> <p>9 that legal process?</p> <p>10 A No.</p> <p>11 Q Do you recall whether you</p> <p>12 opposed or objected to it in any way at</p> <p>13 the time?</p> <p>14 A Yes.</p> <p>15 Q What do you recall?</p> <p>16 A Signing the papers.</p> <p>17 Q And do you remember what the</p> <p>18 papers were?</p> <p>19 A No.</p> <p>20 Q Have you ever seen -- since</p> <p>21 you've been sober, have you ever seen</p> <p>22 any sort of legal papers or court</p> <p>23 documents that memorialize the adoption</p> <p>24 of your daughters by the Griffins?</p> <p>25 A No.</p>

12 (Pages 42 - 45)

<p style="text-align: right;">Page 66</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A No, ma'am. It just was</p> <p>3 natural.</p> <p>4 Q Did you have a particular</p> <p>5 rhythmic instrument that you would</p> <p>6 usually use to come with the beat?</p> <p>7 A My brain.</p> <p>8 Q And would you -- is there any</p> <p>9 way that you would actually memorialize</p> <p>10 what you were creating, did you write</p> <p>11 a -- were you able to transcribe it or</p> <p>12 did you record it on something?</p> <p>13 A Back in the day it was</p> <p>14 cassette tapes. Music paper, I used</p> <p>15 to -- I used to keep like journals of</p> <p>16 stuff.</p> <p>17 Q And after the beat, what</p> <p>18 would typically come next?</p> <p>19 A The melody.</p> <p>20 Q And you would typically come</p> <p>21 up with chorus melody first, you know,</p> <p>22 hook melody, verse melody?</p> <p>23 A However it came to me.</p> <p>24 However it -- however it would -- in a</p> <p>25 creative state, whatever comes first</p>	<p style="text-align: right;">Page 68</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 a famous artist, but I'm my own artist.</p> <p>3 Q Do you recall how many songs</p> <p>4 you've written over time?</p> <p>5 A No. No.</p> <p>6 Q Dozens?</p> <p>7 A Thousands. Of course they're</p> <p>8 still in the trunk somewhere, but I</p> <p>9 wrote them. I wrote them. And I never</p> <p>10 wanted to pursue doing that as a</p> <p>11 profession. It was for me. It was an</p> <p>12 expressive outcasting of whatever. It</p> <p>13 just -- it helped me.</p> <p>14 Q What year were you born?</p> <p>15 A 1960.</p> <p>16 Q And where?</p> <p>17 A Englewood, California.</p> <p>18 Englewood Bassinet Maternity Hospital.</p> <p>19 Q And who was your biological</p> <p>20 mother?</p> <p>21 A Unknown.</p> <p>22 Q And who was your biological</p> <p>23 father?</p> <p>24 A Edward Benjamin Townsend.</p> <p>25 Q Did you ever live with</p>
<p style="text-align: right;">Page 67</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 comes first.</p> <p>3 Q Was there --</p> <p>4 A And sometimes the words would</p> <p>5 come first.</p> <p>6 Q Understood.</p> <p>7 Was there typically something</p> <p>8 that would happen first for you in</p> <p>9 terms of melody, would it --</p> <p>10 A I could be sitting here</p> <p>11 talking to you and all of a sudden</p> <p>12 something hit me and I would say, hold</p> <p>13 on a minute.</p> <p>14 Q Did you write chord</p> <p>15 progressions when you were writing</p> <p>16 music?</p> <p>17 A Sometimes.</p> <p>18 Q And would that be part of the</p> <p>19 beat or would that come later?</p> <p>20 A Whatever would come first</p> <p>21 would come first. I can't recall if</p> <p>22 the chord progressions would come first</p> <p>23 or the melodic structure or the</p> <p>24 baseline or the drum line. However it</p> <p>25 came, it came. I mean, I might not be</p>	<p style="text-align: right;">Page 69</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 either -- well, I assume -- I'll ask</p> <p>3 the question.</p> <p>4 Did you ever --</p> <p>5 A You might have met my mom</p> <p>6 before me. I wouldn't know. You could</p> <p>7 be my mama, I don't know.</p> <p>8 Q Well, no, actually I can't.</p> <p>9 A I'm just saying.</p> <p>10 Q I mean -- just</p> <p>11 chronologically?</p> <p>12 A I'm just saying. Anybody</p> <p>13 could have been her.</p> <p>14 MS. FARKAS: Let's take a</p> <p>15 five-minute break. Now is a good</p> <p>16 point.</p> <p>17 (Whereupon, a brief recess</p> <p>18 was taken.)</p> <p>19 Q Did you ever live with either</p> <p>20 of your biological parents?</p> <p>21 A My father, Ed Townsend.</p> <p>22 Q When was that?</p> <p>23 A When I met him in '03 -- I</p> <p>24 mean, '86 is when I met him. I'm</p> <p>25 sorry.</p>

18 (Pages 66 - 69)

<p style="text-align: right;">Page 70</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Q How long did you live with</p> <p>3 him during that time?</p> <p>4 A On and off periodically.</p> <p>5 Q Did you have a bedroom in his</p> <p>6 home?</p> <p>7 A Yes, I did.</p> <p>8 Q When you say on and off, for</p> <p>9 how long of a period of time?</p> <p>10 A I was still in my addiction,</p> <p>11 so I would disappear.</p> <p>12 Q And where was his house?</p> <p>13 A In California.</p> <p>14 Q Where?</p> <p>15 A Hollywood. I don't remember</p> <p>16 the addresses -- how many different</p> <p>17 addresses, it was quite a few.</p> <p>18 Q When you say quite a few, but</p> <p>19 in terms of Ed's home, was it only one</p> <p>20 home during this time?</p> <p>21 A No, quite a few.</p> <p>22 The last was in Reseda, a</p> <p>23 townhome in Reseda.</p> <p>24 Q And prior to 1986, had you</p> <p>25 ever lived with either of your</p>	<p style="text-align: right;">Page 72</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 you're not, here's your birth</p> <p>3 certificate. And it had Dr. David</p> <p>4 Owens on the birth certificate.</p> <p>5 Q Do you have a copy of that</p> <p>6 birth certificate?</p> <p>7 A I didn't bring it, but I do.</p> <p>8 MS. FARKAS: We would ask</p> <p>9 that be produced.</p> <p>10 Q When you say mixed breed, why</p> <p>11 do you say that?</p> <p>12 A Because the mother was white.</p> <p>13 Q The mother meaning your</p> <p>14 biological mother?</p> <p>15 A Yes.</p> <p>16 Q And how do you know that?</p> <p>17 A Because I was told.</p> <p>18 Q Who told you that?</p> <p>19 A My father, Ed Townsend.</p> <p>20 Q Did he ever tell you her</p> <p>21 name?</p> <p>22 A He would never give me her</p> <p>23 name.</p> <p>24 Q Do you know if they were</p> <p>25 married at the time that she had you?</p>
<p style="text-align: right;">Page 71</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 biological parents?</p> <p>3 A I didn't know I was adopted.</p> <p>4 I found out in -- in '86. I thought my</p> <p>5 whole life I was Kathy Griffin. I had</p> <p>6 no idea I was Cherrigale Townsend. And</p> <p>7 I found that out -- all my life --</p> <p>8 going to just tell you. All my life --</p> <p>9 I was born in Englewood, California.</p> <p>10 And Ernest and Shirley Griffin moved</p> <p>11 when I was four years old to</p> <p>12 Hattiesburg, Mississippi. And I didn't</p> <p>13 find out until 1986, because my whole</p> <p>14 life -- I grew up in Mississippi when</p> <p>15 it was segregated and the black people,</p> <p>16 we went through the back door and you</p> <p>17 know the story. And I was a mixed</p> <p>18 breed child in Mississippi. And if I</p> <p>19 didn't bring candy and money to the</p> <p>20 black kids, they would beat me up. Oh,</p> <p>21 Kathy Griffin you white. Oh, Kathy</p> <p>22 Griffin you're adopted. And I would go</p> <p>23 home and say, Momma, they say I'm</p> <p>24 adopted. And she would pull out a</p> <p>25 birth certificate and tell me, no</p>	<p style="text-align: right;">Page 73</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A My father has only been</p> <p>3 married, to my knowledge, to Cherrigale</p> <p>4 Townsend. But I spoke with Cherrigale</p> <p>5 before she died and she gave me a lot</p> <p>6 of history about my birth saying</p> <p>7 that -- Cherrigale told me more than Ed</p> <p>8 told me. Cherrigale told me that once</p> <p>9 my father found out that my biological</p> <p>10 mother could not keep me because she</p> <p>11 was white, and allegedly a famous lady</p> <p>12 in the entertainment business, that her</p> <p>13 doctor was David Owens. And Shirley</p> <p>14 Griffin's doctor was David Owens. And</p> <p>15 all my life my mother had a scar on her</p> <p>16 stomach, and she would tell me this is</p> <p>17 where I came from. But I found out</p> <p>18 later she had a hysterectomy, and</p> <p>19 that's what that scar was.</p> <p>20 But back then they didn't</p> <p>21 tell you if you were adopted or not.</p> <p>22 And interesting enough, the people in</p> <p>23 my hometown in Hattiesburg, it looked</p> <p>24 like everybody knew I was adopted but</p> <p>25 me, including my mother's closest</p>

19 (Pages 70 - 73)

<p style="text-align: right;">Page 78</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Owens bought his gas from Ernest</p> <p>3 Griffin. And Dr. Owens -- this is what</p> <p>4 I was told by my parents. My -- Dr.</p> <p>5 Owens drove into the gas station and</p> <p>6 had this baby in the front seat, a</p> <p>7 newborn baby. And Ernest Griffin said,</p> <p>8 whose baby? And Dr. Owens said, yours</p> <p>9 if you want her. And he said, well, we</p> <p>10 just adopted this other baby but let me</p> <p>11 call my wife. And she went over to his</p> <p>12 office. And they had me with a little</p> <p>13 cup propped up with my bottle in it.</p> <p>14 And my bottom was chafed because Dr.</p> <p>15 Owens had taken me home with him and</p> <p>16 his wife. And his wife was an</p> <p>17 alcoholic and she hadn't -- back then</p> <p>18 it was cloth diapers.</p> <p>19 Q How old were you at this</p> <p>20 point?</p> <p>21 A I had to have been a couple</p> <p>22 of months.</p> <p>23 Q Where were you for the first</p> <p>24 couple of months?</p> <p>25 A With the doctor who delivered</p>	<p style="text-align: right;">Page 80</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Because all of them knew about me, I'm</p> <p>3 the only one who didn't know about me.</p> <p>4 Q Just so I'm clear with the</p> <p>5 history, you were born in 1960 in</p> <p>6 California?</p> <p>7 A March 13th, 1960 in Englewood</p> <p>8 Bassinet. And I've always known that</p> <p>9 because that's on the birth</p> <p>10 certificate. Even though there is a</p> <p>11 sealed copy of a birth -- a live birth</p> <p>12 somewhere, I just have never seen the</p> <p>13 original with -- and but Ed told me</p> <p>14 that he saw it.</p> <p>15 Q What does the birth -- the</p> <p>16 birth certificate that you've seen says</p> <p>17 what?</p> <p>18 A Says Ernest and Shirley --</p> <p>19 Ernest L. Griffin is the father, and it</p> <p>20 said mechanic as the profession. And</p> <p>21 Shirley Josephine Holliman is the</p> <p>22 biological and then Griffin, biological</p> <p>23 mother housewife. That's what it says,</p> <p>24 I think.</p> <p>25 Q That's on the birth</p>
<p style="text-align: right;">Page 79</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 me. And Ed and Dr. Owens made an</p> <p>3 arrangement for him to place me with a</p> <p>4 family. Because -- and then Cherrigale</p> <p>5 told me, after she knew that Ed had --</p> <p>6 had a baby -- outside baby from the</p> <p>7 marriage, she told him to go get the</p> <p>8 baby and bring the baby home and she</p> <p>9 would raise me. When my mother and</p> <p>10 father, Ernest and Shirley found that</p> <p>11 out, my mother worked for Mattel. She</p> <p>12 quit her job and Ernest Griffin sold</p> <p>13 the gas station and they moved to</p> <p>14 Hattiesburg, Mississippi so that Ed</p> <p>15 Townsend could not find me because he</p> <p>16 was looking for me to bring me to his</p> <p>17 wife, Cherrigale, and they wanted to</p> <p>18 raise me. Thank God they didn't raise</p> <p>19 me because both of my brothers are</p> <p>20 deceased now. I'm just saying, but</p> <p>21 so --</p> <p>22 Q When did Ed -- do you know</p> <p>23 when Ed married Cherrigale?</p> <p>24 A I have no clue. I don't</p> <p>25 know. Maybe Helen might know that.</p>	<p style="text-align: right;">Page 81</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 certificate that you've seen?</p> <p>3 A That's what I think is on the</p> <p>4 birth certificate that I've seen.</p> <p>5 Q Have you ever seen a birth</p> <p>6 certificate that was anyone else as</p> <p>7 your biological parents?</p> <p>8 A No, it was sealed at birth.</p> <p>9 I was told that by Ed and Cherrigale,</p> <p>10 that that birth certificate had been</p> <p>11 sealed.</p> <p>12 Q Correct me if I'm wrong, that</p> <p>13 you were born in Englewood, California,</p> <p>14 and you were told that Dr. David Owens,</p> <p>15 the doctor who delivered you, took you</p> <p>16 home for a few months from the</p> <p>17 hospital?</p> <p>18 A Yes.</p> <p>19 Q And then arranged with</p> <p>20 Shirley and Ernest Griffin --</p> <p>21 A To place me with them.</p> <p>22 Q -- to place you with them?</p> <p>23 A And then she told me it took</p> <p>24 her nine months to legally adopt me.</p> <p>25 And it was funny because -- you</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 understand, I'm an adult woman still on</p> <p>3 drugs when she's telling me this. And</p> <p>4 all of her plans for me had gone south</p> <p>5 because I got involved in the drugs.</p> <p>6 And she told me, she says, it took me</p> <p>7 nine months to legally adopt you, if I</p> <p>8 could find a doorstep to go put you on,</p> <p>9 I would. That's what she said. That's</p> <p>10 why I remember. If I had known then</p> <p>11 what I had known now, I would have left</p> <p>12 you on the doorstep. That's what she</p> <p>13 told me. That's what she said to me.</p> <p>14 And then after that I</p> <p>15 contacted Hubert Laws, he's a famous</p> <p>16 jazz flautist, the number -- one of the</p> <p>17 number one flautist in the world that I</p> <p>18 was dating at this time. And he comes</p> <p>19 out of that famous Laws family; Ronnie,</p> <p>20 Debbie, Eloise, they're a big musical</p> <p>21 family. And I called Hubert and I</p> <p>22 said, Hubert, have you ever heard of</p> <p>23 somebody named Ed Townsend. He said,</p> <p>24 everybody knows Ed Townsend. I said,</p> <p>25 well I don't.</p>	<p style="text-align: right;">Page 84</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 whole life. Because Ernest and Shirley</p> <p>3 changed my name from Cherrigale</p> <p>4 Townsend to Kathryn Marie Griffin. And</p> <p>5 then my mother Shirley told me that she</p> <p>6 did that so that they could never find</p> <p>7 me. Because Ed and Cherrigale wanted</p> <p>8 to come and raise me. So that's why</p> <p>9 they sold their business and she quit</p> <p>10 Mattel and moved to Mississippi and</p> <p>11 they couldn't find me.</p> <p>12 Q So was it your understanding</p> <p>13 that the name on your original birth</p> <p>14 certificate was Cherrigale Townsend?</p> <p>15 A I know that now, but I didn't</p> <p>16 know that because. And because Shirley</p> <p>17 didn't tell me that my name was</p> <p>18 Cherrigale Townsend. She was -- until</p> <p>19 I found out and she finally admitted</p> <p>20 it, I was Kathryn Marie Griffin.</p> <p>21 And let me just say this, my</p> <p>22 addiction escalated because I had just</p> <p>23 gotten out of my first rehab when I --</p> <p>24 when I found out I was adopted I had</p> <p>25 just gotten out of the Bell Park</p>
<p style="text-align: right;">Page 83</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Q When was this conversation?</p> <p>3 A Right after I found out I was</p> <p>4 adopted in '86.</p> <p>5 Q Okay.</p> <p>6 A And so what he did was, my</p> <p>7 father played golf, obviously, and he</p> <p>8 knew where my father played golf. And</p> <p>9 I said, well, can you just get me his</p> <p>10 phone number. So he says, the guy that</p> <p>11 plays golf with your dad, I have his</p> <p>12 number. But I'll get him to give me Ed</p> <p>13 Townsend's phone number. So Hubert</p> <p>14 called me back like a week later after</p> <p>15 I found out I was adopted. And it was</p> <p>16 funny because I called the number. And</p> <p>17 when I called the number, Ed Townsend</p> <p>18 answered the phone and I had said,</p> <p>19 hello, is this Ed Townsend? He said,</p> <p>20 yes. Who's this? I said, do you know</p> <p>21 a Dr. David Owens? He said, yes, who's</p> <p>22 this? And I said, this is your</p> <p>23 daughter. And he said, Oh my God.</p> <p>24 Then we both were crying. He was like,</p> <p>25 Oh my God I've looked for you your</p>	<p style="text-align: right;">Page 85</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Hospital. And when I talked to Ed and</p> <p>3 we made arrangements for me to meet</p> <p>4 with him, and I ended up meeting him in</p> <p>5 Mound Bayou, Mississippi. Because I</p> <p>6 was laughing, I'm like, you mean to</p> <p>7 tell me he's somebody in the music</p> <p>8 business and I ain't going to</p> <p>9 California, New York, I'm going to</p> <p>10 Mississippi where I've been all the</p> <p>11 time. Because he had bought a hospital</p> <p>12 and turned it into -- he was turning it</p> <p>13 into a school for music in Mound Bayou,</p> <p>14 Mississippi. So I ended up going -- I</p> <p>15 just went up the highway to Mound</p> <p>16 Bayou, Mississippi to meet my father.</p> <p>17 And when I met Ed, and he</p> <p>18 brought my two brothers Cliff Michael</p> <p>19 Townsend and David Edward Townsend, who</p> <p>20 was also in the music business, to</p> <p>21 Mound Bayou so they could -- they said</p> <p>22 they knew they had a sister. I'm like,</p> <p>23 everybody in the world know, how come I</p> <p>24 don't know nothing? So I went there</p> <p>25 and the strangest thing happened. Ed</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 110</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 I remember him telling me that -- he</p> <p>3 told me the whole story about how he</p> <p>4 introduced Jan Gaye to Marvin. And he</p> <p>5 was -- he knew Jan's mom. And Jan was</p> <p>6 his Goddaughter. And he told me all of</p> <p>7 that and then he told -- because was</p> <p>8 very upset that -- after Jan and Marvin</p> <p>9 were no longer together, Jan was on</p> <p>10 food stamps. And he went to Berry</p> <p>11 Gordy and he confronted him and told</p> <p>12 him -- whatever the conversation was,</p> <p>13 Jan ended up getting money after that</p> <p>14 because she had children and he didn't</p> <p>15 think she should be living in poverty</p> <p>16 the way she was living in poverty. I</p> <p>17 remember that, him saying that.</p> <p>18 Q Did he tell you what portions</p> <p>19 of Let's Get It On he created?</p> <p>20 A He told me 100 percent. And</p> <p>21 he said to me that -- because Marvin</p> <p>22 had a drug addiction, he gave him a</p> <p>23 percentage of the song so that his</p> <p>24 children would be taken care of.</p> <p>25 Now, I don't know -- back</p>	<p style="text-align: right;">Page 112</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 He didn't break it down and I wrote 56</p> <p>3 bars of this and -- and Marvin put --</p> <p>4 no. He wrote the song with Aunt Helen,</p> <p>5 so she'll know more about that than me.</p> <p>6 I can't -- you just have me talking,</p> <p>7 I'll be talking.</p> <p>8 Q No, I don't want you to just</p> <p>9 talk.</p> <p>10 A Yeah, I don't want to just</p> <p>11 talk. I'm just telling you, he told me</p> <p>12 he owned 100 percent of the song and to</p> <p>13 keep it in the family. And that's what</p> <p>14 he told me. And then he wrote other</p> <p>15 songs, and me and him wrote stuff</p> <p>16 together. I'm just telling you that's</p> <p>17 what he said to me.</p> <p>18 Q So how -- I'm trying to</p> <p>19 understand you telling us that Ed told</p> <p>20 you that he wrote 100 percent of the</p> <p>21 song and that he owned 100 percent of</p> <p>22 the song, but at the same time you're</p> <p>23 saying that he gave a piece of the song</p> <p>24 to Marvin?</p> <p>25 A That's what he said to me.</p>
<p style="text-align: right;">Page 111</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 then I didn't know what writers,</p> <p>3 performers, performance credits or any</p> <p>4 of that. But he told me he owned</p> <p>5 100 percent publishing of Let's Get It</p> <p>6 On.</p> <p>7 Q And just so we're clear --</p> <p>8 A And he showed me paperwork.</p> <p>9 Q Well, one thing at a time.</p> <p>10 So am I correct that Ed</p> <p>11 Townsend told you that he wrote all of</p> <p>12 the music and all of the lyrics to</p> <p>13 Let's Get It On?</p> <p>14 A He told me it was his song.</p> <p>15 Yes, he did.</p> <p>16 Q Well, I'm not just asking</p> <p>17 you --</p> <p>18 A I'm just telling you what he</p> <p>19 said to me.</p> <p>20 Q Did he say to you words to</p> <p>21 the effect of it's my song, or did he</p> <p>22 tell you specifically that he wrote all</p> <p>23 of the words and he wrote all of the</p> <p>24 music to the song?</p> <p>25 A He told me it was his song.</p>	<p style="text-align: right;">Page 113</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 That's what he said to me. Now,</p> <p>3 what -- I'm just -- I could see him</p> <p>4 sitting at that desk and I'm sitting in</p> <p>5 that chair right now, and him with that</p> <p>6 cigarette.</p> <p>7 Q Did he discuss with you at</p> <p>8 all the process that he went through to</p> <p>9 create Let's Get It On?</p> <p>10 A He told me this: He wrote</p> <p>11 the song. He said, you know, it's</p> <p>12 funny, and he was laughing. Everybody</p> <p>13 thinks Let's Get It On is about getting</p> <p>14 it on. People got married to it and</p> <p>15 had babies to it. He said, Let's Get</p> <p>16 It On is about getting sober. I was</p> <p>17 trying to get sober. It's the only</p> <p>18 song I wrote in my career that I was</p> <p>19 sober. And he said -- he said, I've</p> <p>20 been -- I've really trying. He was</p> <p>21 very animated kind of like -- I guess</p> <p>22 like me, trying to hold back this</p> <p>23 feeling for so long. But if you feel</p> <p>24 like I feel, let's get it on, I wanted</p> <p>25 to be clean and sober. Because we all</p>

29 (Pages 110 - 113)

<p style="text-align: right;">Page 114</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 are really sensitive people, and look</p> <p>3 at us, we got something to give. We</p> <p>4 need to learn to start understanding</p> <p>5 each other. So since we gotta be here,</p> <p>6 let's -- let's live. Let's live.</p> <p>7 That -- because he was -- he got</p> <p>8 excited when he was telling me. This</p> <p>9 is how he was, you know.</p> <p>10 And I'm sitting here looking</p> <p>11 at this man and he was really feeling</p> <p>12 it. He meant, that's why I wrote this</p> <p>13 song. He was so passionate about it.</p> <p>14 And that's why I'm a damn fool too,</p> <p>15 because that's how he was. I remember</p> <p>16 it.</p> <p>17 Q Do you remember when this</p> <p>18 conversation took place?</p> <p>19 A No. Unfortunately I didn't</p> <p>20 have a book, and a time, and I didn't</p> <p>21 know I was going to ever need to</p> <p>22 maintain this information for any</p> <p>23 reason whatsoever.</p> <p>24 Q No. And also to be fair it</p> <p>25 was a long time ago, correct?</p>	<p style="text-align: right;">Page 116</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 done? What have I done? So it was</p> <p>3 probably in '87, '88. Somewhere in</p> <p>4 there, I don't know. But it was just</p> <p>5 one of the many drug rehab stints for</p> <p>6 me. He never went back again because</p> <p>7 he stayed sober after that. I'm the</p> <p>8 one that acted a fool.</p> <p>9 Q And how do you know he stayed</p> <p>10 sober after that?</p> <p>11 A Are you kidding? He was --</p> <p>12 Q I'm just asking.</p> <p>13 A He was a -- I mean AA, he</p> <p>14 wrote the play, Been There Done That</p> <p>15 about rehabilitation. He was a</p> <p>16 warrior. He would go -- he even taught</p> <p>17 the prostitutes on Sunset Boulevard</p> <p>18 when they were walking down the street</p> <p>19 to turn their pockets inside out when</p> <p>20 they walked down the street so that the</p> <p>21 pimps will see they didn't have money</p> <p>22 and not beat them up. And he started</p> <p>23 trying to help get them off the street</p> <p>24 and clean and sober the way he could.</p> <p>25 That was his way of giving back, I</p>
<p style="text-align: right;">Page 115</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A It was between the time I met</p> <p>3 him and the time he died.</p> <p>4 Q And during that time you were</p> <p>5 going through addiction, correct?</p> <p>6 A I was high, but I wasn't high</p> <p>7 when he told me that.</p> <p>8 Q How do you know that?</p> <p>9 A Because he and I both went to</p> <p>10 treatment at the same time. I went to</p> <p>11 Safe Harbor and he to Harbor Light.</p> <p>12 And we had this conversation during the</p> <p>13 rehabilitation because -- the period</p> <p>14 that we were at Salvation Army here --</p> <p>15 no, I wasn't in California. Out there</p> <p>16 in California on 5th Street, Salvation</p> <p>17 Army, you can look it up.</p> <p>18 Q Do you know roughly what year</p> <p>19 that was?</p> <p>20 A No.</p> <p>21 Q Was it in the '90s?</p> <p>22 A Right after -- I told you he</p> <p>23 went into treatment after he found</p> <p>24 out -- when we got high together that</p> <p>25 time. He was like, oh, what have I</p>	<p style="text-align: right;">Page 117</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 think. And he formed the Been There</p> <p>3 Done That, because I tried to get the</p> <p>4 name -- he left that to me, but in</p> <p>5 Texas somebody had Been There Done That</p> <p>6 so I had to put We've Been There Done</p> <p>7 That to get the d/b/a in Mississippi --</p> <p>8 I mean, in Houston, Texas.</p> <p>9 Q Did Ed Townsend discuss with</p> <p>10 you his decision -- let me ask a</p> <p>11 different question.</p> <p>12 Did Ed Townsend discuss with</p> <p>13 you the circumstances under which</p> <p>14 Marvin Gaye got involved with the song,</p> <p>15 Let's Get It on?</p> <p>16 A He called him over to Aunt</p> <p>17 Helen's house, I think, and played the</p> <p>18 song for him. And -- and they went</p> <p>19 back and forth about the arrangement,</p> <p>20 like the vocals. I think somebody -- I</p> <p>21 don't -- Aunt Helen knows that. That's</p> <p>22 foggy, but...</p> <p>23 Q Do you know --</p> <p>24 A Marvin loved the song.</p> <p>25 Q Do you know whether Ed and</p>

30 (Pages 114 - 117)

<p style="text-align: right;">Page 150</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 for so long by, I guess you guys. You</p> <p>3 all ignored like I was nothing, like I</p> <p>4 was still worthless. And --</p> <p>5 Q You were aware we were having</p> <p>6 conversations with your attorney at</p> <p>7 this time before you filed the lawsuit,</p> <p>8 correct?</p> <p>9 A No.</p> <p>10 Q You should speak to your</p> <p>11 attorneys about that.</p> <p>12 A No.</p> <p>13 Q Now, at the time you gave</p> <p>14 this interview though you had already</p> <p>15 filed a lawsuit against my clients,</p> <p>16 correct?</p> <p>17 A Correct.</p> <p>18 Q Can I draw your attention to</p> <p>19 the second page of this document.</p> <p>20 There is a question in bold at the very</p> <p>21 top of the page that I'm going to read,</p> <p>22 it says: Do you remember the first</p> <p>23 time you heard Ed Sheeran's Thinking</p> <p>24 Out Loud.</p> <p>25 A Um-hum.</p>	<p style="text-align: right;">Page 152</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 I didn't even remember what</p> <p>3 all was in the article.</p> <p>4 Q And if you go about halfway</p> <p>5 down there's a sentence there that --</p> <p>6 there's a paragraph there that starts</p> <p>7 with the sentence, we own 100 percent</p> <p>8 of the publishing.</p> <p>9 Do you see that?</p> <p>10 A Yes, I do.</p> <p>11 Q Is that accurate?</p> <p>12 A To my knowledge. I'm not an</p> <p>13 expert, but to my knowledge, yes, we</p> <p>14 own 100 percent of the publishing.</p> <p>15 Q So is it your testimony that</p> <p>16 none of the heirs of Marvin Gaye own</p> <p>17 any percentage of the publishing on</p> <p>18 Let's Get It On?</p> <p>19 A If we own 100 percent, then</p> <p>20 to my knowledge, no, just performance.</p> <p>21 Q And then would your testimony</p> <p>22 also be that David Pullman's company</p> <p>23 does not own any percentage of the</p> <p>24 publishing of let's get it on?</p> <p>25 A Let me say, David Pullman</p>
<p style="text-align: right;">Page 151</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 Q And then the answer that they</p> <p>3 have for you, it says: Yeah. I think</p> <p>4 the song had been out a couple of</p> <p>5 months.</p> <p>6 A Okay.</p> <p>7 Q And somebody called a friend</p> <p>8 of mine who works for CBS and said I</p> <p>9 needed to listen to this song because</p> <p>10 this young British kid actually copied</p> <p>11 the music from my dad's song, Let's Get</p> <p>12 It On. And then shortly after that I</p> <p>13 saw your article and this stuff just</p> <p>14 started popping up everywhere.</p> <p>15 Do you see that?</p> <p>16 A Yes.</p> <p>17 Q Does that sound like an</p> <p>18 accurate transcription of what you said</p> <p>19 to the author of this article?</p> <p>20 A I think that's what I just</p> <p>21 said to you.</p> <p>22 Q So that's a yes?</p> <p>23 A Yes. Oh, they even have that</p> <p>24 about the car. Yeah. Because that's</p> <p>25 what I think. Okay.</p>	<p style="text-align: right;">Page 153</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 stole my brother's percentage. He does</p> <p>3 have a percentage. So when I say we,</p> <p>4 David Pullman's words were, we're</p> <p>5 family now. So I've had to take this</p> <p>6 troll, and I'm not -- I shouldn't have</p> <p>7 said that, but anyway, it is what it</p> <p>8 is. It is what it is. It is what it</p> <p>9 is.</p> <p>10 Oh my God.</p> <p>11 Q As between -- do you remember</p> <p>12 having a conversation or do you</p> <p>13 remember the first conversation that</p> <p>14 you had with either Helen or Cherrigale</p> <p>15 about Thinking Out Loud?</p> <p>16 A Yes.</p> <p>17 Q Do you recall when that was?</p> <p>18 A I don't remember when.</p> <p>19 Shortly after I listened to it and was</p> <p>20 asked to go and really listen to it and</p> <p>21 compare the songs.</p> <p>22 Q So would it be safe to say</p> <p>23 that it was after people started</p> <p>24 sending you the mash ups that you</p> <p>25 referred to earlier?</p>

<p style="text-align: right;">Page 190</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A Yes. I said is that her name</p> <p>3 I didn't say was, because you still</p> <p>4 living.</p> <p>5 Q So with respect to Dr.</p> <p>6 Stewart and the musicologist that</p> <p>7 Ms. Farkas was talking about earlier,</p> <p>8 Dr. Ferrara, would it surprise you that</p> <p>9 Dr. Stewart has testified in many cases</p> <p>10 against that musicologist, Mr. Ferrara,</p> <p>11 Dr. Ferrara?</p> <p>12 A Dr. Ferrara is the</p> <p>13 musicologist for the Ed Sheeran?</p> <p>14 Q Yes.</p> <p>15 A And my musicologist has</p> <p>16 testified against that man? That</p> <p>17 doesn't surprise me.</p> <p>18 MS. FARKAS: Objection.</p> <p>19 A My knowledge of Dr. Stewart</p> <p>20 is he's the best. So I'm going to</p> <p>21 believe he's the best. I don't know</p> <p>22 about whoever else, that guy you</p> <p>23 just -- Ferrara. Sounds like a car. I</p> <p>24 don't know. To me, I have no idea.</p> <p>25 Q There you have it.</p>	<p style="text-align: right;">Page 192</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 on a path to do the right thing by my</p> <p>3 father's creation and his work. And</p> <p>4 I'm going to stick to that path because</p> <p>5 that's all I have left to hold on to.</p> <p>6 I was cheated out half of my life of my</p> <p>7 dad. I won't be cheated out of my</p> <p>8 father's legacy.</p> <p>9 MS. RICE: Nothing further.</p> <p>10 MS. FARKAS: I just have</p> <p>11 one -- sorry, one small line of</p> <p>12 questions that I forgot to ask.</p> <p>13 EXAMINATION BY MS. FARKAS:</p> <p>14 Q What is your legal name</p> <p>15 sitting here right now? Is it the name</p> <p>16 that you gave the court reporter at the</p> <p>17 beginning of the deposition?</p> <p>18 A On my identification</p> <p>19 purposely I have left it as Kathryn</p> <p>20 Marie Griffin. On purpose. I don't</p> <p>21 have my husband's name attached to it</p> <p>22 because I am in a profession where I</p> <p>23 deal with pimps, prostitutes. You</p> <p>24 asked, I'm going to tell you why. I</p> <p>25 left it that way because in the life</p>
<p style="text-align: right;">Page 191</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 A I'm cool with that.</p> <p>3 Q So would it surprise you that</p> <p>4 in several of the times in which</p> <p>5 they've testified in the same trial,</p> <p>6 Dr. Stewart has come out victorious</p> <p>7 against Dr. Ferrara?</p> <p>8 MS. RICE: Objection.</p> <p>9 Q You can go ahead and answer.</p> <p>10 A It doesn't matter if</p> <p>11 Ferrara --</p> <p>12 MS. FARKAS: Objection.</p> <p>13 A -- has won or lost. It</p> <p>14 wouldn't matter if Dr. Stewart beat</p> <p>15 him. I don't care about that. I don't</p> <p>16 care about anybody else's lawsuit.</p> <p>17 What I care about is that God has put</p> <p>18 it on my heart that this is the right</p> <p>19 person to have dissected every inch,</p> <p>20 breath, note, bar, treble, base, clef,</p> <p>21 syncopations, staccato, everything.</p> <p>22 And he knows how do that accurately</p> <p>23 because, like I say, I'm not on a witch</p> <p>24 hunt against Ed Sheeran. I'm not. I'm</p> <p>25 not on a witch hunt for anything. I'm</p>	<p style="text-align: right;">Page 193</p> <p>1 TOWNSEND GRIFFIN GRINAN</p> <p>2 people knew that. And because that was</p> <p>3 the name in the life, and I have</p> <p>4 children, and I have a husband, and my</p> <p>5 husband is the senior news anchor at</p> <p>6 Fox, I did not want to connect their</p> <p>7 names to this part of the work that I</p> <p>8 do. I do a lot of undercover stuff. I</p> <p>9 do a lot -- I get a lot of intel. I</p> <p>10 deal with human trafficking. I deal</p> <p>11 with stuff I can lose my life.</p> <p>12 Q So is the name --</p> <p>13 A My ID says Kathryn Griffin.</p> <p>14 Q Has your name ever legally</p> <p>15 been changed to include the name</p> <p>16 Townsend in it?</p> <p>17 A Legally?</p> <p>18 Q Correct.</p> <p>19 A I got married, so I -- why</p> <p>20 would I change it to -- legally to</p> <p>21 Townsend and I am Grinan.</p> <p>22 Q I don't know.</p> <p>23 Have you ever changed your</p> <p>24 middle name to be Townsend?</p> <p>25 A No, I did not. My middle</p>

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1	1
2 name is what it is, Marie.	2 CERTIFICATION
3 Q So your legal name, as far as	3
4 the government is concerned --	4 STATE OF NEW YORK)
5 A I'm listed as Kathryn Marie	5) ss.:
6 Griffin.	6 COUNTY OF NEW YORK)
7 MS. FARKAS: Thank you.	7 I, JUDITH CASTORE, Shorthand Reporter
8 THE WITNESS: It makes things	8 and Notary Public within and for the State
9 much easier. But that don't	9 of New York, do hereby certify:
10 change what my blood is.	10 That KATHRYN TOWNSEND GRIFFIN GRINAN,
11 MS. FARKAS: No further	11 the witness whose deposition is
12 questions at this time.	12 hereinbefore set forth, was duly sworn by
13 MS. RICE: We'll read.	13 me and that this transcript of such
14 (Time noted: 2:50 p.m.)	14 examination is a true record of the
15	15 testimony given by such witness.
16	16 I further certify that I am not
17	17 related to any of the parties to this
18	18 action by blood or marriage and that I am
19	19 in no way interested in the outcome of
20	20 this matter.
21	21 IN WITNESS WHEREOF, I have hereunto
22	22 set my hand this 5th day of May, 2018.
23	23
24	24 <i>Judith Castore</i>
25	25 JUDITH CASTORE

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1	1
2 ACKNOWLEDGEMENT	2 INDEX
3	3 WITNESS PAGE
4 STATE OF NEW YORK)	4 KATHRYN TOWNSEND GRIFFIN GRINAN
5) ss.:	5 Examination by:
6 COUNTY OF NEW YORK)	6 MS. FARKAS 4
7	7 EXHIBITS
8 I, KATHRYN TOWNSEND GRIFFIN GRINAN,	8 (Retained by Veritext Legal Solutions)
9 certify, I have read the transcript of my	9 DEFENDANTS' PAGE
10 testimony taken under oath in my	10 Exhibit 1 Document request 123
11 deposition of April 24, 2018; that the	11 Exhibit 2 Interview of Spin Magazine, dated 148
12 transcript is a true, complete and correct	12 8/12/16
13 record of what was asked, answered and	13 Exhibit 3 Complaint 155
14 said during this deposition, and that the	14
15 answers on the record as given by me are	15
16 true and correct.	16
17	17
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24	24
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